



---

# Wisconsin Legislative Council

## RULES CLEARINGHOUSE

---

**Scott Grosz**  
Clearinghouse Director

**Anne Sappenfield**  
Legislative Council Director

**Margit Kelley**  
Clearinghouse Assistant Director

## CLEARINGHOUSE RULE 22-020

### Comments

**[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Council Staff and the Legislative Reference Bureau, dated November 2020.]**

#### 1. Statutory Authority

The agency’s listing of statutory authority could cite more precisely to the statutes discussed in the explanation of agency authority, specifically ss. 138.14 (8) (b), 217.10 (3), 218.0152 (3), and 218.02 (9) (a), Stats.

#### 2. Form, Style and Placement in Administrative Code

a. In proposed ss. DFI-Bkg 73.001 (7), 73.06 (1) (b) and (e), 75.01 (10), 75.11 (1) (b) and (e), 76.001 (10), 76.14 (1) (b) and (e), 79.01 (7), and 79.02 (1) (b) and (e), was the use of “nationwide multistate licensing system and registry” instead of “NMLS” intentional? Those are the only instances in the rule text where “NMLS” is not used uniformly. Consider revising the proposed rule to consistently use the defined acronym.

b. The agency may wish to consider including a note in each corresponding provision to explain how an applicant and licensee registers with, and obtains a valid unique identifier from, the NMLS.